

Privacy Notice

This privacy notice will inform you as to how we look after your personal data when you interact with us and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy here:

<https://horizonparking.co.uk/wp-content/uploads/2019/07/Privacy-Notice-v1.4.pdf>

1. ***Important information and who we are***
2. ***the data we collect about you***
3. ***how is your personal data collected***
4. ***how we use your personal data***
5. ***disclosures of your personal data***
6. ***data security***
7. ***data retention***
8. ***your legal rights***

1. **Important information and who we are**

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and processes your personal data when you interact with us, including any data you may provide to us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Horizon Parking Ltd is the data controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy notice).

For data personal submitted via our secure client permit portal the landowner is the data controller and we shall process any personal data supplied in line with our contract with the landowner.

Contact details

Postal address: Horizon Parking Ltd, Finitor House, 2 Hanbury Road, Chelmsford, CM1 3AE

Email address: dp@horizonparking.co.uk

Telephone number: 01245 392289

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us at dp@horizonparking.co.uk in the first instance.

Changes to the privacy notice and your duty to inform us of changes

We may amend this notice from time to time in order to meet changes in the regulatory environment, business needs or to meet the needs of our customers. This version was last updated on 29.03.2019 and historic versions can be obtained by contacting us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications in order to make payments. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

If you are providing us with your personal data when enquiring, purchasing, registering or subscribing to one of our services or when appealing a Parking Charge Notice, then we will only use this data to process your request and communicate with you.

To do what we need to do to run our business and pursue our legitimate interests we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** including first name, maiden name, last name, title, your association with a vehicle, vehicle registration mark, images of your vehicle registration plate and your vehicle.
- **Contact Data** including address, email address and telephone numbers.
- **Transaction Data** including details about payments to and from you and other details of parking time and services you have purchased from us.
- **Technical Data** through our website which includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** including your username and password.

- **Usage Data** including information about how you use our website including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect Special Categories of Personal Data about you, however, if you provide this data to us when appealing a Parking Charge Notice we will ensure it is kept secure.

Customers or clients using our permit portal for, and on the behalf of the Landowner, accept in their own capacity as a data subject, or have gained valid acceptance from the data subject permission to provide or access the personal data for the purpose of car park management.

3. How is your personal data collected?

We use different methods to collect personal data from and about you through:

- **Direct interactions.** This includes personal data you provide when you:
 - contact us about our products or services;
 - appeal a Parking Charge Notice;
 - pay a Parking Charge Notice; or
 - give us some feedback or request information on our services.
- **Automated technologies or interactions.** This includes personal data we or third parties acting on our behalf collect when you:
 - interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies;
 - visit car parks managed by us when may automatically or manually directly or via third parties collect your vehicle registration mark and photographs of your vehicle.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - a) website analytics providers based outside the EU;
 - b) parking management equipment providers based inside the EU;
 - c) website administrators based in the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as:
 - a) parking management equipment providers based inside the EU;
 - b) payment service providers based inside the EU;
 - c) collection agents based inside the EU;
 - d) Solicitors based inside the EU.
- Identity and Contact Data from publicly available sources such as:
 - a) the driver vehicle licence agency based inside the EU;
 - b) the Parking on Private Land Appeals (POPLA) service based in the EU.

4. How we use your personal data

All personal data collected by us is only used in accordance with the General Data Protection Regulations (GDPR). Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation;
- In response to requests by government or law enforcement authorities.

The processing of your personal data for the collection of Parking Charge Notices is necessary for a contract which has been entered into and there is a legitimate interest to do so. We are entitled to pursue a motorist for an unpaid parking tariff or an unpaid parking charge.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at dp@horizonparking.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to "contact us" queries	(a) Identity (b) Contact	Performance of a contract with you
To manage the terms and conditions of parking at sites which we have been contracted to manage and recover debts. To enforce these terms and conditions of parking through the issue of Parking Charge Notices.	(a) Identity (b) Transaction	(a) Delivery of our contract with our clients (b) Necessary for our legitimate interests (to recover debts due to us and our clients)

To enable us to respond to Parking Charge Notice queries and appeals	(a) Identity (b) Contact (d) Transaction	(b) Necessary for our legitimate interests (to recover debts due to us and our clients)
To respond to media or PR enquires	(a) Identity (b) Contact	(a) Necessary for our legitimate interests
To respond to a commercial enquires	(a) Identity (b) Contact	(a) Necessary for our legitimate interests
To register you as a permit holder on our permit lists.	(a) Identity (b) Contact	(a) Delivery of our contract with the landowner (b) Necessary for our legitimate interests
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Unless you tell us otherwise we may contact you by post, email, or telephone about the product or service you have requested from us.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK TO YOUR COOKIE POLICY.]

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties such as:

- a. the British Parking Association for the purpose of audit of our car park management service;
- b. the driver vehicle licence agency (DVLA) for the purpose of audit of our car park management service;
- c. the Parking On Private Land Appeals (POPLA) Service for the purpose of reviewing and your appeal;
- d. print and mail service providers for issuing Parking Charge Notice and responding to your correspondence;
- e. email service providers for responding to your correspondence;
- f. collection agents for recovery of debts due to us;
- g. solicitors for the purpose of enforcing the parking contract or responding to queries of a legal nature;
- h. any other duly authorised sub-contractors.
- i. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data security

We look after your personal data by putting security procedures in place which is appropriate for its nature. Although we will do our best to protect your data we cannot guarantee the security of your data transmitted to our website. Once received all personal data is held in a secure environment. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We design our services so that we don't hold your personal data for longer than we have to.

Details of retention periods for different aspects of your personal data are available in our retention policy which are available upon request, please contact us at dp@horizonparking.co.uk

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights: if you wish to exercise any of the rights set out above, please contact us at dp@horizonparking.co.uk

We have a Privacy Team who are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact us at dp@horizonparking.co.uk

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, we will need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have

objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data.

Withdraw consent at any time where we are relying on consent to process your personal data. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We will respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you if we need an extension and keep you updated.